

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Delano Dejuan MARTIN

Case No. Case: 2:25-mj-30010
Assigned To : Unassigned
Assign. Date : 1/16/2025
Description: CMP USA V. MARTIN
(DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 15, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 841(a)(1)

Manufacture, distribute, dispense, possess a controlled substance

21 U.S.C. 846

Attempt and Conspiracy

This criminal complaint is based on these facts:

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☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 16, 2025

City and state: Detroit, Michigan

R. Robinson

Complainant's signature

Special Agent Rajay Robinson - DEA

Printed name and title

Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth Stafford U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

Affiant, Special Agent Rajay Robinson, being duly sworn, deposes and states the following:

1. I am a Special Agent (SA) of the Drug Enforcement Administration and have been so employed since March of 2024. I am a law enforcement officer empowered to conduct investigations and make arrests for violations of Title 21, United States Code.
2. This affidavit is provided in support of a criminal complaint for Delano Dejuan MARTIN. This affidavit is based on my personal knowledge obtained from personal observation, review of documents, reports, and information received from other law enforcement agents and subject-matter experts. Because of the limited purpose of this affidavit, I have not set forth all the information of which I have become aware in the course of this investigation.

PROBABLE CAUSE

3. In January 2025, the DEA's Detroit Division Office (DDO) Strike Force Group 4 (SFG4) received information from DEA Chicago regarding an unidentified Metro Detroit area narcotics trafficker (FNU LNU) that deals in kilogram quantities of narcotics.
4. On January 15, 2025, DEA Detroit and DEA Chicago utilized a confidential source (CS) to arrange a meeting with the narcotics trafficker in Metro Detroit. The

CS spoke to FNU LNU on the phone, and FNU LNU told the CS that he had three kilograms of fentanyl and would have his courier provide a sample to the CS for testing prior to the CS purchasing them. FNU LNU stated that he wanted the CS to meet with his courier at the Redford Motel in Redford, Michigan. Investigators directed the CS to meet with the courier for the purpose of receiving a sample.

5. At approximately 2:08 p.m., Investigators observed the CS arrive at the Redford Motel. At approximately 2:42 p.m., Investigators observed a black male (later identified as Delano Dejuan MARTIN) wearing a dark colored jacket and dark pants approach the CS's vehicle. Shortly after, Investigators observed MARTIN exit the vehicle and walk down the street to the north. MARTIN then walked west along an alley and entered a dark colored Jeep Cherokee that was parked in an apartment complex on Cathedral Avenue, Redford, Michigan. At approximately 2:49 p.m., MARTIN entered the apartment complex.

6. Per Michigan Secretary of State's database, the Jeep Cherokee is registered to Delano Dejuan MARTIN.

7. After the CS met with MARTIN, Investigators followed the CS to a neutral location where they took possession of the sample of fentanyl and debriefed the CS. The CS was shown a photo of MARTIN and the CS positively identified him as the subject that provided the sample of fentanyl. The CS stated that FNU LNU and MARTIN wanted the CS to purchase a room at the Redford Motel so that they

could utilize the room to exchange the drugs and count the money. The CS was directed by investigators to inform FNU LNU that the quality of the sample wasn't good and that he wanted to see the kilo itself that the sample was taken from. The CS communicated this to FNU LNU on the phone, and FNU LNU agreed and stated that he would call his courier to bring the kilo to the CS at the Redford Motel.

8. At approximately 3:00 p.m., Investigators observed MARTIN walk from the west side of the Redford apartment complex towards the east where his vehicle was parked. Martin got in the car and drove away. Investigators maintained surveillance of MARTIN.

9. At approximately 3:12 p.m., Investigators observed MARTIN arrive at and enter an apartment complex located on Lathers Street in Westland, Michigan (the Jeep Cherokee's registered address). Shortly after, Investigators observed MARTIN exit the residence carrying a cardboard box. He placed the cardboard box on the front passenger side of his Jeep, got in the car, and departed the area. Investigators maintained surveillance of MARTIN.

10. As MARTIN was driving from Westland to the Redford Motel, at approximately 3:18 p.m., law enforcement conducted a traffic stop of MARTIN's Jeep Cherokee. MARTIN was the driver and sole occupant. Police asked MARTIN for his identification and to step out of the vehicle. MARTIN was not cooperative

with police and claimed to be a sovereign citizen, rolled up his windows over halfway, and then locked his doors. An officer was able to unlock and open the vehicle door. He removed MARTIN from the vehicle.

11. A trained narcotics canine conducted an open-air sniff of the vehicle which yielded a positive alert on the front passenger door. A search of that area located approximately three kilograms of suspected fentanyl inside of a cardboard box on the front passenger seat.

12. MARTIN has a previous drug related criminal history which consists of multiple arrests for dangerous drugs in 2001, 2004, 2005, 2006, and 2012. In 2012, he was sentenced to 188 months in federal prison and 4 years supervised release for conspiracy to distribute controlled substances. He is currently on supervised release in the Eastern District of Michigan.

CONCLUSION

13. Based on the foregoing, there is probable cause to support the issuance of a criminal complaint against Delano Dejuan MARTIN for violations of 21 U.S.C. § 841(a) (possession with intent to distribute controlled substances), and 21 U.S.C. § 846 (conspiracy to distribute controlled substances).

Respectfully submitted,

R. Robinson

Special Agent Rajay Robinson
Drug Enforcement Administration

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Elizabeth A. Stafford

HONORABLE ELIZABETH STAFFORD
United States Magistrate Judge

Date: January 16, 2025